

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

|                          |   |             |
|--------------------------|---|-------------|
| UNITED STATES OF AMERICA | : |             |
|                          | : |             |
| v.                       | : | 1:25CR218-1 |
|                          | : |             |
| NAVONNE MOORE            | : |             |

FACTUAL BASIS FOR A GUILTY PLEA

NOW COMES the United States of America, by and through Randall S. Galyon, Acting United States Attorney for the Middle District of North Carolina, and states that the factual basis for a guilty plea is as follows:

**Background**

The Coronavirus Aid, Relief, and Economic Security (“CARES”) Act was enacted in March 2020 and designed to provide emergency financial assistance to the millions of Americans who were suffering negative economic effects caused by the COVID-19 pandemic. Among other programs, the CARES Act established the Coronavirus Relief Fund which provided payments to states and eligible units of local government to be used on certain expenses in response to the COVID-19 emergency.

The North Carolina Department of Health and Human Services (“NC DHHS”), using the federal CARES Act funding provided to North Carolina, established the COVID-19 Support Services Program to support individuals in

targeted counties who needed care and resources in order to successfully quarantine and isolate. NC DHHS contracted with regional partners, including the Piedmont Health Services and Sickle Cell Agency (“PHSSCA”), to provide and deliver the support on the ground in designated counties.

Of relevance to this case, available support services included nutrition services such as home-delivered meals and groceries to individuals in isolation and quarantine, as well as provision of COVID-related over-the-counter supplies, such as a face mask, hand sanitizer, and cleaning supplies. PHSSCA was designated to provide support services in several counties in North Carolina, including Montgomery County.

In Montgomery County, PHSSCA subcontracted with Brutonville Concerned Citizens (“BCC”) to provide support services, including the delivery of healthy food boxes and COVID-related supplies to qualifying individuals. Under the terms of the contract, PHSSCA agreed to reimburse BCC for the following services provided to qualifying individuals in Montgomery County: (a) \$90.04 per food box delivered for one person, (b) \$141.06 for a food box delivered to a household with more than two family members, and (c) \$50 per package of COVID-related over-the-counter supplies.

BCC was a not-for-profit community organization located in Montgomery County. The defendant, Navonne Moore, served as the Treasurer

of BCC. Jamie Ewings served as a Board Member of BCC.<sup>1</sup> Co-Conspirator-2 (“CC-2”) also provided services to BCC, though his role was less clear. Moore signed the contract between PHSSCA and BCC on October 9, 2020. The contract directed BCC to submit monthly expenditure reports, with receipts and invoices for project-related expenses.

### **The Stolen Funds**

After the contract was signed, the co-conspirators submitted inflated and fraudulent invoices and receipts to PHSSCA so that BCC would be reimbursed large sums of money to which it was not entitled. Moore, Ewings, and CC-2 also agreed to divide the reimbursement money amongst themselves. Meanwhile, Moore, Ewings, and CC-2 concealed from some of the other BCC members the details of the program, the amount of money BCC received from PHSSCA, and the payments to the co-conspirators.

Between about October 2020 and February 2021, Moore and the co-conspirators submitted documentation and expenditure reports to PHSSCA reporting that BCC provided about 1,713 food boxes for individuals, 5,133 food boxes for families, and 5,327 boxes of over-the-counter COVID supplies in accordance with its contract with PHSSCA.<sup>2</sup> BCC submitted fraudulent

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<sup>1</sup> Ewings was charged in case number 1:25CR141-1.

<sup>2</sup> Although BCC provided some food boxes and services to the community during this time, the numbers, invoices, and documentation provided to PHSSCA to obtain

invoices and documentation to PHSSCA to support those amounts and obtain the funding. For example, BCC submitted invoices purporting that it purchased food from Harvest Ministries Outreach for inclusion in the food boxes. An agent with the Federal Bureau of Investigation interviewed the Chief Executive Officer of Harvest Ministries Outreach who reported that he had never dealt with BCC and did not recognize the invoices. Ultimately, PHSSCA reimbursed BCC about \$1,144,649 over five payments between November 2020 and February 2021.

Each time a deposit was received in BCC's account, the funds were split amongst Moore, Ewings, and CC-2. Moore received the least amount of the funds. Specifically, and in total, Ewings received about \$384,000 (about one third of the money), CC-2 received about \$369,00 (about one third of the money), and Moore received about \$180,000 (about 16% of the money). Moore kept the rest of the money in BCC's account. Because checks required two signatures, Moore would ask the then-President of BCC to sign blank checks for her. Moore used those blank checks to pay herself, Ewings, and CC-2.<sup>3</sup>

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reimbursements contain misrepresentations and are not supported by the other records. For example, BCC appeared to have only about \$20,000 worth of legitimate receipts for the purchase of supplies for the boxes, yet it claimed, through the co-conspirators, to have passed out over 10,000 boxes of food during a short time frame.

<sup>3</sup> Separately, BCC was a volunteer organization and no one was paid a salary. The Board would have to approve any payments to these individuals, which it did not.

On or about March 5, 2021, Moore stole a portion of the aforementioned federal funding identified above.

This the 11th day of June 2025.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on June 11, 2025, the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to counsel of record:

Stacey D. Rubain, Esq.

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